

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JOHN DOE-1 and JANE DOE-2,
individually and on behalf of all others
similarly situated,

Plaintiffs,

vs.

LEXISNEXIS RISK SOLUTIONS INC.,
RICHARD ROES 1-10, fictitious names of
unknown individuals and ABC
COMPANIES 1- 10, fictitious names of
unknown entities,

Defendants.

Civil Action No. 1:24-cv-04566

Honorable Harvey Bartle, III, U.S.D.J.

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO RESPOND TO
LEXISNEXIS'S MOTION TO DISMISS PLAINTIFFS' SECOND
AMENDED COMPLAINT AND RESET BRIEFING SCHEDULE**

Plaintiffs, pursuant to Fed. R. Civ. P. 6(b)(1), file this unopposed motion for an extension of time to file their response to LexisNexis Risk Solutions, Inc.'s ("LexisNexis") Motion to Dismiss Plaintiffs' Second Amended Complaint ("Motion") [ECF No. 73] and to reset the briefing schedule. In support, Plaintiffs state:

1. On March 6, 2025, LexisNexis filed the Motion [ECF 73].
2. The current deadline for Plaintiffs to respond is March 24, 2025.

3. Plaintiffs seek an extension of time to file their response to the Motion and respectfully request that this Court enter an Order resetting the briefing schedule as follows:

- a. Plaintiffs shall have up to and including April 7, 2025 to respond to the Motion.
 - b. LexisNexis shall have up to and including April 21, 2025 to reply in support of the Motion.
4. LexisNexis's counsel consents to the relief requested herein.
5. This extension will not prejudice any party.

WHEREFORE, Plaintiffs respectfully request that the Court enter an Order providing Plaintiffs an extension to respond to the Motion and to reset the briefing schedule.

Respectfully submitted,

March 17, 2025

By: s/ Rajiv D. Parikh
PEM LAW LLP

Rajiv D. Parikh (032462005)
Jessica A. Merejo, Esq. (288592020)
1 Boland Dr Suite 101
West Orange, NJ 07052
Tel: (973) 577-5500
Email: rparikh@pemplawfirm.com
jmerejo@pemplawfirm.com

BOIES SCHILLER FLEXNER LLP
Adam Shaw (admitted *pro hac vice*)
30 South Pearl Street, 12th Floor

Albany, NY 12207
Tel.: (518) 434-0600
Email: ashaw@bsfllp.com

Mark Mao (admitted *pro hac vice*)
Julia Bront (Admitted *pro hac vice*)
44 Montgomery St., 41st Floor
San Francisco, CA 94104
Tel.: (415) 293-6800
Email: mmao@bsfllp.com
jbront@bsfllp.com

James Lee (admitted *pro hac vice*)
100 SE 2nd St., 28th Floor
Miami, FL 33131
Tel.: (305) 539-8400
Email: jlee@bsfllp.com

Eric Palmer (admitted *pro hac vice*)
401 E. Las Olas Blvd., Suite 1200
Fort Lauderdale, Florida 33301
Telephone: (954) 377-4250
Email: epalmer@bsfllp.com

MORGAN & MORGAN P.A.

John A. Yanchunis (admitted *pro hac vice*)
Ryan J. McGee (admitted *pro hac vice*)
201 North Franklin Street, 7th Floor
Tampa, FL 33602
Tel.: (813) 223-5505
Email: jyanchunis@ForThePeople.com
rmcgee@ForThePeople.com